

BLANKROME

1271 Avenue of the Americas | New York, NY 10020
blankrome.com

Phone: (212) 885-5270
Fax: (917) 332-3795
Email: thomas.belknap@blankrome.com

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 2/16/2024

February 16, 2024

BY ECF

Honorable Victor Marero
Suite 1610 Courtroom 15B
United States Courthouse United States Courthouse
500 Pearl Street 500 Pearl Street
New York, New York 10007 New York, New York 10007

Re: SimpleFuel DMCC v. Presently Unknown Defendant A et al.
24-cv-01149 (VM)

Dear Judge Marero:

We represent SimpleFuel DMCC in this matter. We write seeking leave to file under seal an unredacted copy of the Declaration of Ivan Chechuy dated February 16, 2024 (Dkt. No. 7) and of Plaintiff's Proposed Order to Show Cause (Dkt. No. 4).

By way of background, this matter involves criminal and/or fraudulent conduct by unknown individuals who spoofed emails from one of Plaintiff's business counterparty and tricked Plaintiff into making a wire transfer of \$394,506 to a bank account at J.P. Morgan Bank in New York. This action seeks an order of attachment of the bank account to which Plaintiff transferred the funds, as well as a temporary restraining order directing that any funds not be disbursed from the account pending resolution of the application for an attachment.

The Court's rules require that we redact all but the last four digits of the bank account in any public filing; however, to allow the garnishee to identify the account they will require the full account number. We have filed redacted versions of the Chechuy Declaration, which contains at Exhibit 3 the full bank account details, and the proposed order, which fully identifies the account for purposes of the attachment and TRO; however, the Court will require unredacted copies of each document in order to consider the application and issue the proposed order. Accordingly, we respectfully request leave to file unredacted versions of these two documents under seal.

BLANKROME

Honorable Victor Marero
February 16, 2024
Page 2

We are available to answer any questions if the Court would find that helpful.

Respectfully submitted,

/s/ Thomas H. Belknap, Jr.

Thomas H. Belknap, Jr.
Partner

THB:

